

## Exhibit C

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18 *Counsel for Defendant Meta Platforms, Inc.*

19 **UNITED STATES DISTRICT COURT**  
 20 **NORTHERN DISTRICT OF CALIFORNIA**

21 **SAN FRANCISCO DIVISION**

22 RICHARD KADREY, *et al.*,  
 23 Individual and Representative Plaintiffs,  
 24 v.  
 25 META PLATFORMS, INC., a Delaware  
 corporation;  
 26 Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S  
 OBJECTIONS AND RESPONSES TO  
 PLAINTIFFS' CORRECTED SECOND SET OF  
 REQUESTS FOR PRODUCTION**

Trial Date: None  
 Date Action Filed: July 7, 2023

1     **RESPONSE TO REQUEST No. 63:**

2           Meta incorporates by reference its objections and definitions above. Any electronic  
 3     communications, including email and documents attached thereto, will only be produced pursuant  
 4     to and in accordance with the ESI Order.

5           Meta objects to this Request because, on its face, it seeks and does not exclude documents  
 6     and communications exchanged with or at the direction of Meta's attorneys concerning legal advice  
 7     or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine.  
 8     Such documents will not be produced.

9           Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the  
 10    needs of the case to the extent it seeks all documents and communications from or to Mr. Dettmers  
 11    concerning the subject matter of the Request, including documents with limited, if any, relevance  
 12    to Plaintiffs' copyright infringement allegations and Meta's defenses thereto.

13          Meta objects to this Request to the extent it seeks information that is not relevant to any  
 14    party's claims or defenses, in particular as Mr. Dettmers was uninvolved in the development or  
 15    training of the Meta Language Models (as construed above).

16     **REQUEST FOR PRODUCTION No. 64:**

17          Documents and Communications sufficient to show each instance within the last three years  
 18    where You have licensed copyrighted works for Meta's commercial use.

19     **RESPONSE TO REQUEST No. 64:**

20          Meta incorporates by reference its objections and definitions above. Any electronic  
 21     communications, including email and documents attached thereto, will only be produced pursuant  
 22     to and in accordance with the ESI Order.

23          Meta objects to this Request because, on its face, it does not exclude documents and  
 24     communications exchanged with or at the direction of Meta's attorneys concerning legal advice or  
 25     opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such  
 26     documents will not be produced.

27          Meta objects to the phrase "commercial use" as vague, ambiguous, and undefined.

28          Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the

1 needs of the case because it seeks documents with limited, if any, relevance to Plaintiffs' copyright  
 2 infringement allegations and Meta's defenses thereto. In particular, the Request appears to seek  
 3 documents relating to Meta's licensing of third party materials for any purpose, irrespective of any  
 4 connection to the development or training of the Meta Language Models (as construed above).

5 Meta objects to this Request to the extent it seeks information that is not relevant to any  
 6 party's claims or defenses.

7 **REQUEST FOR PRODUCTION NO. 65:**

8 Documents and Communications sufficient to show each instance within the last five years  
 9 where You have alleged a claim of copyright infringement against another.

10 **RESPONSE TO REQUEST NO. 65:**

11 Meta incorporates by reference its objections and definitions above. Any electronic  
 12 communications, including email and documents attached thereto, will only be produced pursuant  
 13 to and in accordance with the ESI Order.

14 Meta objects to this Request because, on its face, it does not exclude documents and  
 15 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or  
 16 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such  
 17 documents will not be produced.

18 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the  
 19 needs of the case because it seeks documents with limited, if any, relevance to Plaintiffs' copyright  
 20 infringement allegations and Meta's defenses thereto. Further, on its face, it is not limited to claims  
 21 in the United States.

22 Meta objects to this Request to the extent it seeks information that is not relevant to any  
 23 party's claims or defenses. Copyright infringement is a fact-specific inquiry; any claims Meta may  
 24 have asserted turn on the facts of those cases and are not relevant to the claim asserted here, which  
 25 is limited to a claim based on the alleged copying of Plaintiffs' registered works for training the  
 26 Meta Language Models (as construed above).

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